



**Service of Process  
Transmittal**

04/25/2019

CT Log Number 535363469

**TO:** Sue Carlson  
Target Corporation  
1000 Nicollet Mall  
Minneapolis, MN 55403-2542

**RE: Process Served in Virginia**

**FOR:** Target Stores (Assumed Name) (Domestic State: MN)  
Target Corporation (True Name)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** ANNAKUTTY JOSEPH, PLTF. vs. TARGET STORES, INC, DFT.  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** Summons, Complaint

**COURT/AGENCY:** Prince William County Circuit Court, VA  
Case # 153CL1800418400

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition - 05/21/2016

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Glen Allen, VA

**DATE AND HOUR OF SERVICE:** By Process Server on 04/25/2019 at 12:30

**JURISDICTION SERVED :** Virginia

**APPEARANCE OR ANSWER DUE:** Within 21 days after such service

**ATTORNEY(S) / SENDER(S):** Kevin M. Leach, Esq.  
TURBITT, LEACH & CRUM, PLLC  
8996 Burke Lake Rd.  
Suite 304  
Burke, VA 22015  
703-323-7000

**ACTION ITEMS:** CT has retained the current log, Retain Date: 04/25/2019, Expected Purge Date:  
04/30/2019

Image SOP

Email Notification, Non Employee Litigation Target gl.legal@target.com

**SIGNED:** C T Corporation System

**ADDRESS:** 4701 Cox Road  
Suite 285  
Glen Allen, VA 23060

**TELEPHONE:** 804-217-7255



COMMONWEALTH OF VIRGINIA **DO NOT WRITE**



PRINCE WILLIAM CIRCUIT COURT

Civil Division  
9311 LEE AVENUE  
MANASSAS VA 20110  
(703) 792-6029

Summons

To: TARGET STORES  
REGISTERED AGENT  
CT CORPORATION SYSTEM  
4701 COX RD STE 285  
GAINESVILLE VA 20155

Case No. 153CL18004184-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Friday, April 19, 2019

Clerk of Court: JACQUELINE C SMITH

by

*Kara Jordan*

(CLERK/DEPUTY CLERK)

Instructions:

COMPLAINT

Hearing Official:

Attorney's name:

LEACH, KEVIN M; ESQ  
8996 BURKE LAKE RD STE 304  
703-323-7000  
BURKE VA 22015

**VIRGINIA:**

**IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY**

**ANNAKUTTY JOSEPH**

**Plaintiff,**

**v.**

**TARGET STORES, INC.  
a/k/a TARGET CORPORATION  
STORE LOCATION NO.: 1873  
13301 Gateway Center Drive  
Gainesville, VA 20155**

**Serve Registered Agent:  
CT Corporation System  
4701 Cox Road, Suite 285  
Glen Allen, VA 23060-0000**

**Defendants.**

**Case No:**

CL18-4184

**COMPLAINT**

COMES NOW, the Plaintiff, by Counsel, and moves this Honorable Court for judgment against the Defendant on the grounds and in the amount set forth below:

**FACTS**

1. On May 21, 2016 the Plaintiff, Ms. Annakutty Joseph was a business invitee at the Super Target located in Gainesville, Virginia when she slipped and fell on water located within the store.

**COUNT I**

**Negligence**

2. Paragraph 1 is incorporated herein as if fully recited.

3. The Defendant as owner, occupier and/or operator of the relevant premises had a duty to exercise ordinary care to maintain the common areas of the store in a safe condition for the use of the Plaintiff and others similarly situated.

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4. This Defendant breached this duty owed to the Plaintiff when it and/or its agents, employees and/or servants allowed an unsafe condition to exist on the premises and failed to warn the Plaintiff about this unsafe condition; failed to remove the unsafe condition; failed to block off the area of the store where the unsafe condition was located and/or failed to reroute traffic away from this unsafe condition.

5. As a direct and proximate result of the negligence of the Defendant the Plaintiff was injured.

## COUNT II

### Negligence per se

6 Paragraphs 1 through 5 are incorporated herein as if fully recited.

7. Defendant as owner, occupier, and/or operator of the premises had a duty to maintain the premises in accordance with the standards contained in the BOCA National Building Code, the Council of American Building Officials, the Virginia Uniform Standard Building Code, the National Property Maintenance Code, the Prince William County Code and all other applicable ordinances, codes, and laws.

8. Defendant failed to maintain the premises in accordance with the standards contained in the aforementioned codes. Such standards included but were not and/or are not limited to the requirement to maintain the premises in a safe condition for invitees; to remove dangerous conditions from the premises; and keep the premises free from dangerous conditions and/or route customer traffic such as the Plaintiff away from said dangerous conditions.

9. The Plaintiff was in a class of people that these codes were intended to benefit and protect. Due to the failure of the Defendant, to comply with the applicable codes, the Plaintiff was not benefited or protected and was in fact injured.

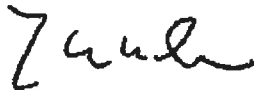
10. The injuries sustained by the Plaintiff were of the kind of harm for which these codes were designed to protect.

11. The failure by the Defendant, to properly maintain the premises in accordance with the standards contained in these codes is negligence per se and is the direct and proximate cause of the Plaintiff's injuries.

WHEREFORE, as a result of the injuries sustained by the Plaintiff because of the negligence and negligence per se, by the Defendant as recited herein, the Plaintiff demands judgment against the Defendant in the sum of NINE HUNDRED THOUSAND DOLLARS (\$900,000.00) and her costs in this behalf along with interest from May 21, 2016 and for such other relief that this Court may deem just and proper.

PLAINTIFF DEMANDS A TRIAL BY JURY.

Annakutty Joseph  
By Counsel



Kevin M. Leach, Esq.  
Virginia State Bar #: 75893  
TURBITT, LEACH & CRUM, PLLC  
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